

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

CR 420-0014

UNITED STATES OF AMERICA) INDICTMENT NO.
)
 v.) 18 U.S.C. § 1956(h)
) Conspiracy to Commit Money
 SHARON ANN WALTON) Laundering
)

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times relevant to this Indictment:

Banks and Financial Service Organizations

1. Lincoln Financial Group Trust Company ("Lincoln Financial") was a financial service organization.
2. Lincoln Financial managed retirement savings accounts for B&G Foods, Inc.
3. Lincoln Financial utilized third parties to process its transactions by wire, which wire transmissions traveled in and affected interstate commerce.
4. Branch Banking & Trust Company ("BB&T Bank") was a financial institution as defined under 18 U.S.C. § 20 and 31 U.S.C. 5312(a)(2) that was engaged in, and the activities of which affected, interstate and foreign commerce.
5. BB&T Bank has branch offices in Savannah, Georgia, and throughout the State of Georgia.

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COUNT ONE

Conspiracy to Commit Money Laundering
18 U.S.C. § 1956(h)

6. Paragraphs 1-5 of this Indictment are realleged and incorporated herein.

7. From at least in or around June 2018 and continuing to in or about October 2018, in Chatham County within the Southern District of Georgia and elsewhere, the Defendant,

SHARON ANN WALTON,

did knowingly combine, conspire, and agree with other persons known and unknown to commit an offense against the United States in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, wire fraud in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

8. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

- a. It was part of the scheme and conspiracy that members of the conspiracy would obtain unauthorized access to a Lincoln Financial retirement savings account for the purpose of making unauthorized wire transfers.
- b. It was further part of the scheme and conspiracy that members of the conspiracy initiated wire transactions from a Lincoln Financial retirement savings account by knowingly and intentionally using the materially false and fraudulent pretense that the bona fide account holder had authorized the wire transfers.
- c. It was further part of the scheme and conspiracy that K.D. would coordinate with members of the conspiracy to have monies wired from the Lincoln Financial retirement savings accounts into a BB&T Bank account controlled by K.D., without authorization from the bona fide account holder.
- d. It was further part of the scheme and conspiracy that K.D. would conduct cash withdrawals from the aforementioned BB&T Bank accounts, after monies were wired from the Lincoln Financial retirement savings account without authorization

from the bona fide account holder.

- e. It was further part of the scheme and conspiracy that K.D. would deliver the aforementioned cash withdrawals to Defendant **WALTON**, after monies were wired from the Lincoln Financial retirement savings account without authorization from the bona fide account holder.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATIONS

9. The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

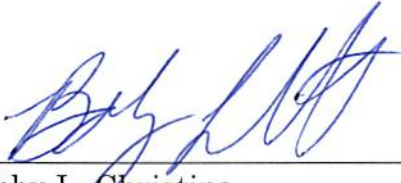
10. Upon conviction of the Title 18 offenses set forth in Count One of this Indictment, the Defendant **SHARON ANN WALTON** shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1) any and all property, real or personal, involved in the offense, or any property traceable to the such property.

11. If any of the property described above, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty,

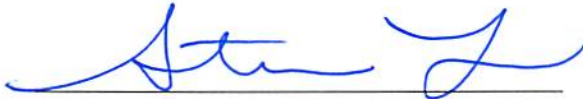
the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).



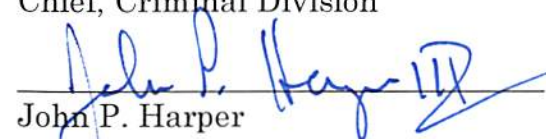
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A True Bill.

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